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Kimberly Topper
Center for Drug Evaluation and Research (HFD-21)
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Dear Ms. Topper,

I am a Physician Assistant who deals with chronic and acute pain management. My patients include those who have been involved in motor vehicle accidents, work related injuries, as well as those with long standing Rheumatoid and Osteoarthritis and multiple fractures.

I have found that chronic opioid therapy can play a key role in providing measured analgesic therapy that improves their physical and emotional outcomes. I have learned that not all people benefit from opioid therapy because each situation is unique. Opioid therapy should be used in conjunction with physical therapy and other modalities that warrant a multidisciplinary approach to care.

Initially, other therapies should be considered if they are safe and specific for the underlying cause of the pain. I have found that the patient's quality of life can improve markedly with a comprehensive pain management program. Oxycontin has been a mainstay in many of these programs.

I support the use of opioid analgesics for the treatment of chronic, non-cancer pain when used in a comprehensive pain management program.

Yours for the Art of Medicine,



Robert B. Howell, PAC, RN